

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor,

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and the Chapter
7 Estate of Bernard L. Madoff,

Plaintiff,

v.

SHARON KNEE,

Defendant.

Adv. Pro. No. 10-04986 (CGM)

**STIPULATION AND ORDER ADJOURNING DEADLINES FOR
TRUSTEE'S MOTION FOR SUMMARY JUDGMENT**

Irving H. Picard (the "Trustee"), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Sharon Knee ("Defendant") by and

through her counsel, Michael Cassell of Hogan & Cassell LLP (collectively, the “Parties”), hereby stipulate and agree to the following:

WHEREAS, on August 24, 2022, the Trustee filed his motion for summary judgment (the “Motion”) in the above-referenced adversary proceeding [ECF Nos. 60–66];

WHEREAS, on September 7, 2022, this Court entered a Stipulation and Order to Extend Response Deadline and Adjourn Argument Date [ECF No. 75] (the “Order”); and

WHEREAS, the Parties have reached a settlement in principle resolving the above-captioned adversary proceeding

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein:

1. The deadlines set forth in the Order are hereby adjourned *sine die* to allow the Parties to complete the settlement by October 31, 2022;
2. As soon as practicable after the settlement is finalized, the Parties shall file a Stipulation and Order for Voluntary Dismissal of this Adversary Proceeding.

[Signatures on following page]

Dated: October 5, 2022
New York, New York

/s/ Nicholas J. Cremona

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Attorney for Defendant

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter
7 Estate of Bernard L. Madoff*

SO ORDERED.

**Dated: October 7, 2022
Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris
U.S. Bankruptcy Judge**